

**DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. CROIX**

PORT HAMILTON REFINING &
TRANSPORTATION, LLLP,

Plaintiff,

vs.

NATIONAL INDUSTRIAL SERVICES,
LLC,

Defendant.

CASE NO.: 1:24-CV-00023

ACTION FOR TEMPORARY
RESTRAINING ORDER,
PRELIMINARY INJUNCTION,
AND PERMANENT INJUNCTION

DEFENDANT, NATIONAL INDUSTRIAL SERVICES, LLC'S
MOTION TO TRANSFER VENUE

Defendant, National Industrial Services, LLC, by and through its undersigned counsel, hereby moves this Court to transfer venue pursuant to 28 U.S.C. § 1412 from this honorable court to the United States Bankruptcy Court for the Southern District of Texas ("Home Court"). Defendant files simultaneously its Memorandum of Law in support thereof.

Respectfully submitted,

Dated: September 20, 2024

/s/Kevin F. D'Amour

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